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6
7 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

Case No. 2:18-cr-189-MMD-EJY

9 Plaintiff,

10 v.
11 DANNY RAY SALZER,
12 Defendant.

**STIPULATION TO RESTITUTION
AMOUNT AND PROPOSED ORDER**

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14 It is stipulated and agreed to by and between United States Attorney Nicholas A.
15 Trutanich and Assistant United States Attorney Elham Roohani, counsel for the United States of
16 America, and Federal Defender Rene L. Valladares and Assistant Federal Defender Sylvia Irvin,
17 counsel for Defendant Danny Ray Salzer, that the restitution amount has been agreed upon and
18 that as a result, it is not necessary for this Court to set a restitution hearing.

19 This parties enter this Stipulation for the following reasons:

20 1. On October 16, 2019, this Court sentenced Mr. Salzer to 186 months of
imprisonment. ECF Nos. 48, 50. As requested by the parties, this Court agreed to postpone the
21 restitution hearing to allow the parties to finalize the restitution amount. ECF No. 48. At the
22 sentencing hearing, Mr. Salzer waived his right to be present at the restitution hearing. *See id.*

23 2. Since the sentencing hearing, the parties have conferred regarding the restitution
24 amount. Defense counsel agrees that the Government has met its burden under *Paroline v.*

1 *United States*, 572 U.S. 434 (2014), and *United States v. Galan*, 804 F.3d 1287 (9th Cir. 2015).
2 Accordingly, Mr. Salzer has no legal or factual objections to the restitution request and agrees to
3 pay restitution to Z.R. in the amount of \$23,328.00. No other restitution requests were presented
4 to the Defendant and defense counsel by the Government as to any other victim.

5 3. The parties agree that Mr. Salzer should pay restitution in the total amount of
6 \$23,328.00 to Z.R., and request the Court allow Mr. Salzer to make nominal monthly payments.
7 Concurrent with this Stipulation, the restitution list is being filed **under seal** because it contains
the name of the victim.

8 DATED this 27th day of January, 2020.

9
10 RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

11
12 By /s/ Sylvia Irvin
Sylvia Irvin
Assistant Federal Public Defender

13 By /s/ Elham Roohani
Elham Roohani
Assistant United States Attorney

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15 **RESTITUTION ORDER**

16 Based on the Stipulation submitted by counsel for the Government and defense counsel,
17 IT IS THEREFORE ORDERED that the Defendant Danny Ray Salzer will pay restitution in the
18 amount of \$23,328.00 to Z.R. The restitution list will be attached to the final judgment and filed

19 **UNDER SEAL.**

20 DATED 27th day of January, 2020.

21
22 
23 THE HONORABLE MIRANDA M. DU
UNITED STATES DISTRICT JUDGE